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FCC
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Dear FCC:

We support the FCC's current proposal to open up more channels for LPFM in the latest Notice of Proposed Rulemaking (Docket 99-25). As a non-profit organization we have often sought ways to communicate with the public about our educational offerings in our community and beyond.

As we understand, the rulemaking is chiefly about how LPFM service and translator service should share the remaining open slots on the FM band. The FCC's current proposal appears to be a market-by-market solution. So far, from the FCC's report, it appears as though Santa Cruz is a translator "process market". We think that this is in not an accurate judgment according to what is truly available frequency-wise in Santa Cruz for LPFM. We looked into current LPFM availability in Santa Cruz taking into consideration the "third adjacent" being removed, including "second adjacent waivers". With all the pending translators taking into consideration, we have been told by a radio engineer that there will be no open LPFM channels available in downtown Santa Cruz if the FCC processes all the translators applications in our area.

According to the FCC's report, it appears as it looked for LPFM channels within a 31 x 26 mile area in our area. The urbanized Santa Cruz area encompasses roughly an 8 x 3 mile strip. The FCC's study might not be accurate because it might not take into consideration water areas (the Pacific Ocean). In addition, the rest of the surrounding area is mountainous and rural. Most organizations looking to start a radio station will probably be located within the more urbanized area. Looking around the Monterey Bay area we found the following translators already on the air:

Calvary Network: K202DU (Salinas), K216AX (Santa Cruz), K240CD, K252CK.
Local NPR Station: K207CN (Santa Cruz), K206BQ (Salinas area),
KLOVE/Air 1 Network: K208CW (Monterey), K217CO (Carmel), K242AT (Salinas),
K266BD (Carmel), K276BR (Santa Cruz), and they also broadcast on KLVM and KSRI
(Santa Cruz)
Broken FM Religious Network: K218ET (Carmel), K219LL (Salinas), K234AW
(Monterey),
Other: K260AA (commercial), K277AH (commercial), K291AE (commercial), K248BR
(Pacifica Network), K217CQ (Radio Nueva Vida Network)

So there are 19 translators already licensed that serve the Santa Cruz-Salinas-Monterey market. With the FCC's decision to process translator applications in the Santa Cruz area, the following entities have applications that could be accepted:

KLOVE/Air 1 Network: 93.1 FM, 94.3 FM, 94.9 FM, 102.9 FM
Broadcast Towers: 92.9 FM, 93.1 FM
Radio Nueva Vida Network: 94.1FM, 94.9FM, 103.9 FM
Other: 94.3 FM (Pacifica), 102.9 FM (Radio Assist), 102.9 FM (King City), 103.5 FM
(Radio Bilingue), 106.7 FM (Lazer)

With a decision for the FCC to process the translators in our area, the FCC will—for the most part—be giving the people who already have frequencies in the area extra channels. KLOVE/Air 1 network could go from having 7 channels to having a maximum of 11 radio channels. And in the end there would be no room for not even one LPFM station located in downtown Santa Cruz. We urge the FCC to optimize its current proposed rulemaking to better balance LPFM and translator licensing. Thank you for considering this vital information in your decisions about our community.

Sincerely,

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